## ESTIMATED BUDGET EFFECTS OF REVENUE RECONCILIATION PROVISIONS AS APPROVED BY THE COMMITTEE ON WAYS AND MEANS ON MAY 13, 1993

## **Fiscal Years 1994-1998**

[Millions of Dollars]

Provision	Effective	1994	1995	1996	1997	1998	1994-98
REVENUE-RAISING PROVISIONS							
A. Individual Income and Estate and Gift Tax Provisions							
Increase tax rates paid by high-income individuals (1)  [a.] Add fourth bracket at 36% rate for taxable income over	1/1/93	26,083	17,572	20,590	24,584	26,263	115,091
\$140,000 (joint), \$127,500 (head of household), \$115,000 (single). [b.] Impose a 10% surtax on regular taxable income over \$250,000 (not applicable to capital gains). [c.] Increase minimum							
tax rate to 26% for AMTI of less than \$175,000 and 28% for AMTI over \$175,000; increase AMTI exemption to \$45,000 (joint) and \$37,500 (single). [d.] Extend itemized deduction limitation and personal exemption phaseout scheduled to expire for 1996 and							
1997, respectively.  2. Repeal Health Insurance (HI) wage base cap (2)	1/1/94	0.750	6.000	0.074	0.000	7.000	00.404
3. Reinstate top estate and gift tax rates at 53% and 55%		2,750	6,030	6,374	6,808	7,200	29,161
Reduce deductible portion of business meals and entertainment	1/1/93	475	512	553	598	647	2,785
from 80% to 50%	1/1/94	1,823	3,124	3,287	3,448	3,605	15,287
5. Deny deduction for club dues	1/1/94	128	220	229	240	251	1,068
6. Deny deduction for executive pay over \$1 million	1/1/94	42	55	57	76	105	335
<ol><li>Reduce compensation that can be taken into account for purposes of benefits and contributions under qualified retirement</li></ol>				i di			
plans to \$150,000 in 1994 (1993 cap is \$235,840)  8. Disallow moving expense deduction for meals and real estate	1/1/94	174	542	555	556	556	2,383
expenses	1/1/94	36	362	381	407	442	1,627
9. Individual estimated tax simplification	1/1/94	-1,900			2,600		700

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Provision	Effective	1994	1995	1996	1997	1998	1994-98
10. Increase taxable portion of Social Security and Railroad							
Retirement Tier 1 benefits	4/4/04	0.050	0.404	0.004	7 000	0.400	04 000
B. Provisions Affecting Businesses	1/1/94	2,859	6,104	6,891	7,683	8,462	31,998
<del></del>							
1. Increase corporate tax rate to 35% for taxable income above							
\$10 million (phaseout benefit of 34% rate beginning at \$15							
million) (3)	1/1/93	4,404	2,808	2,943	3,080	3,186	16,421
Deny deduction for lobbying expenses	e/a 12/31/93	99	170	179	187	193	829
Require mark-to-market accounting method for dealers in securities	Average 40/04/00	000	700				
Prohibit double-dip related to FSLIC assistance (4)		828	799	808	820	562	3,817
Extend and modify corporate estimated tax rules		142	92	2	172	254	661
6. Limit section 936 credit	tyba 12/31/93	2,116	428	59	4,279	929	7,810
Modify earnings stripping, portfolio interest, and conduit rules	-	108	514	1,536	2,268	2,261	6,688
C. Foreign Tax Provisions	tyba 12/31/93	63	78	83	88	93	405
_							
Repeal deferral for excessive accumulated foreign earnings	tyba 9/30/93	70	146	176	188	199	779
2. Allocate 50% of R&E expenses to place of performance,							
remainder as in recent statutory rules	(5)	-287	-501	-572	-601	-632	-2,592
3. Revise foreign tax credit for oil and gas and shipping income	tyba 12/31/92	622	440	461	486	510	2,520
Transfer pricing compliance initiative (enhanced penalty provision)							
provision)	tyba 12/31/93	73	73	73	73	73	366
D. Energy and Motor Fuels Provisions						*	
Modified BTU tax (including diesel compliance and import							
amendments) [Rates - per million BTU: Base \$0.268,							
Petroleum \$0.610]	7/1/94	2,069	10,015	16,341	20,751	22,351	71,528
2. Extend 2.5 cents/gallon motor fuels tax (10/1/95 - 9/30/99); transfer							
revenues to Highway Trust Fund (6)	10/1/95			2,595	2,670	2,651	7,916
3. Increase inland waterways fuel tax	1/1/94	9	47	101	153	175	486
E. Compliance Provisions							
Service industry non-compliance initiative	1/1/94	26	89	94	99	103	411
Modified substantial understatement penalty	1/1/94	84	104	101	94	85	469
Raise standard for tax shelter and preparer penalties	1/1/94						***
4. Information reporting for discharge of indebtedness for FDIC,							
RTC, and financial institutions.	DoE	115	115	102	82	75	490
5. Use of Harbor Maintenance Trust Fund for administrative							
expenses	fya DoE	(7)	(7)	(7)	(7)	(7)	(7)
F. Intangibles						` '	` '
Amortization of acquired intangible assets (14 years)	DoE (8)	38	300	454	586	720	2,097

Provision	Effective	1994	1995	1996	1997	1998	1994-98
C. Missellenesus Pausaus Baising Bus Island					•		
G. Miscellaneous Revenue-Raising Provisions							
Substantiation and disclosure of charitable contributions (9)	1/1/94	9	60	64	68	72	27:
2. Expand 45-day interest rule for certain refunds (outlays) (2)	1/1/94	4	46	64	64	64	24
<ol><li>Deny business travel deductions for spouse and dependents on</li></ol>		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
non-business travel	1/1/94	2	20	21	23	24	9
4. Increase withholding rate on bonuses to 28%	1/1/94	188	9	10	10	. 11	22
SUBTOTAL: REVENUE-RAISING PROVISIONS	***************************************	43,252	50,373	64,612	82,640	81,490	322,369
I. INVESTMENT AND TRAINING PROVISIONS							1 1
A. Education and Training Provisions							
Extend employer-provided educational assistance	•						
permanently (10)	7/1/92	-641	-490	-520	-552	-586	0.70
2. Targeted jobs tax credit and youth apprenticeship program:	771732	-041	-430	-520	-552	-300	-2,78
a. Extend targeted jobs tax credit permanently	7/1/92	-282	-303	-357	402	444	1 70
b. Youth apprenticeship credit	1/1/94	-14	-503 -51	-357 -104	-403 -168	-444	-1,78
B. Investment Incentives	171754	- 1-4	-31	-104	-100	-232	-57
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Extend research and experimentation credit permanently      Targeted expitel gains inceptives for investment in appell.	7/1/92	-2,169	-1,534	-1,835	-2,102	-2,337	-9,97
Targeted capital gains incentives for investment in small	4.44.00						
businesses	1/1/93	-17	-124	-206	-276	-329	-95
3. Modify AMT depreciation schedule	• •	-507	-1,664	-2,421	-2,198	-2,151	-8,94
4. Increase section 179 expensing to \$25,000	tyba 12/31/92	-3,949	-1,693	-1,223	-815	-462	-8,14
5. Exempt high-speed rail bonds from private activity bond caps	1/1/94	-4	-17	-35	-56	-67	-180
Extend small-issue manufacturing and agricultural bonds	74.00						
permanently	7/1/92	-16	-33	-48	-60	-70	-227
C. Expansion and Simplification of Earned Income Tax Credit							
(EITC) (11)	1/1/94	-397	-4,328	-7,571	-7,860	-8,180	-28,336
D. Real Estate Investment Provisions							
Extend mortgage revenue bonds permanently	7/1/92	-69	-136	-192	-240	-277	-914
2. Extend low-income housing credit permanently	7/1/92	-373	-597	-938	-1,296	-1,660	-4,864
3. Provide passive loss relief for real estate professionals	1/1/94	-304	-557	-525	-587	-685	-2,658
4. Facilitate pension investments in real estate	1/1/94	-46	-60	-63	-68	-73	-2,036
5. Treatment of certain real property business indebtedness of			•			, , ,	-510
individuals	1/1/93	-138	-110	-60	-30	-28	-366
6. Increase recovery period for non-residential real property					00		500
	ppiso/a 2/25/93	125	355	659	1,038	1,397	3.574

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Provision	Effective	1994	1995	1996	1997	1998	1994-98
E. Luxury Excise Tax; Diesel Fuel Tax for Motorboats			1 1				
1. a. Repeal luxury excise tax on boats, aircraft, jewelry, and furs	1/1/93	60	40	40	50		
b. Index luxury excise tax on automobiles for inflation (12)	1/1/93	-69 -98	-46	-49 470	-52	-55	-270
<ol><li>Impose excise tax on diesel fuel used in noncommercial</li></ol>		-90	-124	-179	-237	-300	-938
motorboatsF. Other Provisions	1/1/94	21	30	28	28	29	137
Extend AMT treatment of gifts of appreciated property to charities							
permanently	(13)	-100	-77	-78	-80	-82	-417
2. Extend General Fund transfer to Railroad Retirement Tier 2 Fund							
permanently	(2)			No Reveni	ue Effect -	<b></b>	
3. Extend 25% deduction for self-employed health insurance	_						
for individuals through 12/31/93	7/1/92	-566					-566
G. Empowerment Zones and Enterprise Communities (14)	1/1/94	-623	-1,041	-1,141	-1,207	-1,264	-5,276
UBTOTAL: INVESTMENT AND TRAINING PROVISIONS	************	-10,236	-12,600	-16,858	-17,221	-17,856	-74,769
	***************************************	-10,236	-12,600	-16,858	-17,221	-17,856	-74,769
I. OTHER REVENUE PROVISIONS	••••••••	-10,236	-12,600	-16,858	-17,221	-17,856	-74,769
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A. Disclosure Provisions  1. Extend tax information access for Department of Veterans Affairs (through 9/30/98)	10/1/97 DoE DoE					136  	136
A. Disclosure Provisions  1. Extend tax information access for Department of Veterans Affairs (through 9/30/98)	10/1/97 DoE DoE days after DoE		-12,600   5		-17,221   5		-74,769 136  25
A. Disclosure Provisions  1. Extend tax information access for Department of Veterans Affairs (through 9/30/98)	10/1/97 DoE DoE					136  	136
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A. Disclosure Provisions  1. Extend tax information access for Department of Veterans     Affairs (through 9/30/98)	10/1/97  DoE  DoE  days after DoE  DoE	  5 	  5 	  5 	  5 	136   5 	136  25  727
A. Disclosure Provisions  1. Extend tax information access for Department of Veterans Affairs (through 9/30/98)	10/1/97  DoE  DoE  days after DoE  DoE	  5	  5	  5	  5	136   5 	136  25

Provision	Effective	1994	1995	1996	1997	1998	1994-98
					•		
NET TOTAL		33,168	37,432	47,393	65,028	63,358	246,383

## Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding.

Legend for "Effective" column: e/a = expenses after

fya = fiscal years after

ppisa = property placed in service after

ppiso/a = property placed in service on or after

tyba = taxable years beginning after tyeo/a = taxable years ending on or after

- (1) Effective 1/1/93, but no penalties for underwithholding or estimated tax in 1993; indexing of 36% rate and surtax brackets effective 1/1/95. Estimate includes provisions to prevent conversion of ordinary income to capital gains.
- (2) Estimate for this provision provided by the Congressional Budget Office (CBO).
- (3) Effective 1/1/93, but no penalties for underwithholding or estimated tax in 1993.
- (4) Because the provision to prohibit double-dipping by thrifts receiving Federal financial assistance affects both Federal revenues and outlays, the net budget effects of this proposal are included in this table. The estimate includes an increase in outlays of \$136 million in 1994, a decrease of \$14 million in 1995, an increase of \$29 million in 1996, an increase of \$95 million in 1997, and an increase of \$109 million in 1998. According to CBO, Budget Act requirements may prohibit counting this provision for pay-as-you-go purposes.
- (5) Effective at expiration of Rev. Proc. 92-56, which is generally the third taxable year beginning after 8/1/91.
- (6) Revenues from the 2.5-cent-per-gallon tax on diesel used in trains would be retained in the General Fund, as would 2.5 cents per gallon of the tax on motorboat, small-engine, and nonhighway recreational fuels.
- (7) Subject to passage of legislation to appropriate funds from the Harbor Maintenance Trust Fund. Revenue effect of the provision: \$3 million in 1995, \$9 million in 1996, \$11 million in 1997, and \$12 million in 1998, for a total of \$35 million over the budget period 1994-1998 (estimate does not include effect on outlays).
- (8) Taxpayer may elect to apply the bill to all property acquired after 7/25/91. Estimate also includes a provision affecting payments to partners retiring or dying on or after 1/5/93.
- (9) Substantiation requirement for charitable contributions in excess of \$750; disclosure related to quid pro quo contributions.
- (10) FICA outlay portion of estimate (off budget): \$176 million for 1994, \$193 million for 1995, \$204 million for 1996, \$217 million for 1997, and \$230 million for 1998; HI outlay portion (on budget): \$40 million for 1994, \$44 million for 1995, \$47 million for 1996, \$49 million for 1997, and \$52 million for 1998.
- (11) Estimate includes outlays of \$339 million in 1994, \$3,735 million in 1995, \$6,895 million in 1996, \$7,191 million in 1997, and \$7,518 million in 1998.
- (12) Estimate includes the effects of (i) exempting demonstrator cars from the luxury tax, effective 1/1/93, and (ii) exempting equipment installed on vehicles for use by disabled individuals, effective 1/1/91.
- (13) Effective for contributions of tangible personal property made after 6/30/92, and for contributions of all property made after 1992.
- (14) Estimate includes specialized small business investment company (SSBIC) provisions.